## IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE DIVISION I

STATE OF TENNESSEE	)		DAVI	20%	
VS.	) ) )	CASE NO: 2004-D-3113	1	SEP 21	
PERRY AVRAM MARCH	)		EXII D	P 02 22	-

## STATE'S RESPONSE TO DEFENDANT'S MOTION FOR BILL OF PARTICULARS

Comes now the State of Tennessee represented by the District Attorney's Office for the Twentieth Judicial District and responds pursuant to Rule 7(c) of the Tennessee Rules of Criminal Procedure as follows:

- 1. As to Count one, the State is unable to give an exact time of the offense. Janet March was last seen alive at 5:00 p.m. on August 15, 1996, by anyone other than the defendant. She was reported missing on August 29, 1996. For the purpose of alibi notification, the State would request a time frame of 5:00 p.m. on August 15, 1996 until 8:00 a.m. August 16, 1996. The only possible witnesses that the State is aware of are Samson March and Tzipora March.
- 2. As to Count two of the indictment, the State is unable to give a specific time of the offense. It could have occurred anytime from August 15, 1996 until August 29, 1996. The State is not asking for notification of alibi as to this count. Possible witnesses or co-conspirators are Paul Eichel, Morris Clinard, and Arthur March.

3. As to Count three of the indictment, the State is unable to give an exact time of the offense. The computer hard drive was present on September 10, 1996 and was missing on September 17, 1996. For the purpose of alibi notification, the State would request a time frame from 12:00 p.m. on September 16, 1996 until 10:30 a.m. on September 17, 1996. Deanne Beard is a possible witness. Ron March and Arthur March are possible witnesses or co-conspirators.

Respectfully submitted,

Ton Thurman

Tenn.Sup.Ct.Reg.#4738

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## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been mailed to John E. Herbison, Attorney at Law, 2016 Eighth Avenue South, Nashville, Tennessee 37204, William D. Massey and Lorna S. McClusky, Attorneys at Law, 3074 East Street, Memphis, Tennessee 38128, on this the day of September, 2005.